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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. CV 20-7811 RS
	)	
Plaintiff,	)	DECLARATION OF CLAUDIA QUIROZ IN
	)	SUPPORT OF UNITED STATES'
v.	)	ADMINISTRATIVE MOTION FOR LEAVE TO
	)	FILE UNDER SEAL EXHIBITS SUBMITTED IN
Approximately 69,370 Bitcoin (BTC), Bitcoin	)	SUPPORT OF ITS OPPOSITION TO NOBUAKI
Gold (BTG), Bitcoin SV (BSV), and Bitcoin	)	KOBAYASHI'S MOTION FOR DIRECT ACCESS
Cash (BCH) seized from	)	AND INTERVENTION
1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx	)	
<u>Defendant.</u>	)	

I, CLAUDIA QUIROZ, being duly sworn, depose and state:

1. I am an Assistant United States Attorney in the Northern District of California. I am an attorney of record in the above-referenced matter. I respectfully submit this declaration in Support of the United States' Administrative Motion for Leave to File Under Seal Exhibits 1 and 2 to the Declaration of Michael Gronager, submitted in support of the United States' Opposition to Nobuaki Kobayashi's Motion for Direct Access and Intervention.

2. In support for its Opposition to Nobuaki Kobayashi's Motion for Direct Access and

1 Intervention, the United States is submitting the Declaration of Michael Gronager, CEO and Co-Founder  
2 of Chainalysis, Inc. (“Chainalysis”). There are two exhibits attached to Gronager’s declaration. Exhibit  
3 1 consists of a report dated July 9, 2015 authored by Gronager titled “MtGox Stolen Funds Analysis.”  
4 Exhibit 2 is an email dated July 9, 2015 sent by Gronager to Kuroda Yukata, Deputy Trustee of MtGox.

5 3. These exhibits contain information related to an ongoing investigation, which could be  
6 compromised if they are made public. Furthermore, Exhibit 1 reveals proprietary methods and  
7 technologies of Chainalysis that should not be in the public domain.

8 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
9 knowledge and belief. Executed this 7th day of May 2021 in San Francisco, California.

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11 Claudia Quiroz  
12 CLAUDIA QUIROZ  
13 Assistant United States Attorney  
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